

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

TAKISHA REID,

Plaintiff,

-against-

**NOTICE OF PLAINTIFF'S
MOTION TO VACATE
ORDER AND JUDGMENT
PURSUANT TO FED. R. CIV.
P. 60(B)**

20-CV-03926-PK

CITY OF NEW YORK, et al.,

Defendants.

-----X

PLEASE TAKE NOTICE, that upon the Declaration of Matthew Christiana, dated April 29, 2025; the Declaration of Takisha Reid, dated April 29, 2025, the accompanying Memorandum of Law, dated April 29, 2025, all exhibits annexed hereto; and all prior pleadings and proceedings had herein, Plaintiff Takisha Reid will move this Court, before the Honorable Peggy Kuo, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 60 vacating this Court's Order and Judgement granting summary judgment in favor of Defendant City of New York as to Plaintiff's Negligent Screening, Hiring, Retention, and Training claim, and dismissing Defendant City as a defendant, together with such other and further relief as the Court deems just and proper.

[THIS SECTION LEFT INTENTIONALLY BLANK]

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's April 16, 2025 Scheduling Order, Defendant City's response, if any, must be served upon Plaintiff and filed by May 19, 2025; and Plaintiff's reply papers, if any, shall be served and filed by May 27, 2025.

Dated: Brooklyn, New York
April 29, 2025

By: Matthew Christiana
Matthew Christiana
KOPKE CHRISTIANA & RASTETTER LLP
199 Cook Street, Suite 308
Brooklyn New York, 11206

Attorney for Plaintiff Takisha Reid

cc: BY E.C.F.
Peter Till
pwt@till-law.com
Attorney for Defendant Howard

Michael Viviano
mviviano@law.nyc.gov
Attorney for Defendant City of New York